

**REMARKS****Status of the Claims**

Claims 1, 5, 8, 12, 14, and 18 are currently present in the Application, and claims 1, 8, and 14 are independent claims. Claim 14 has been amended, claims 21-26 have been added, and no claims have been canceled in this Amendment. Applicants are not conceding in this Application that those claims are not patentable over the art cited by the Examiner, as the present claim amendments and cancellations are only for facilitating expeditious prosecution of the remaining claims. Applicants respectfully reserve the right to pursue these and other claims in one or more continuation and/or divisional patent applications.

**Examiner Interview**

Applicants note with appreciation the Examiner Interview conducted on July 14, 2008 between Applicants' undersigned attorney and Examiner Hoang. During the interview, Applicants' Attorney argued that U.S. Patent Pub. 2002/0085579 by Sullivan et al. (hereinafter "Sullivan") did not teach a "redirection server" as taught and claimed by Applicants in claim 1. Instead, Sullivan merely teaches a centralized database that, in one implementation, is stored in a "registry server." Sullivan's "registry server" is used to provide data to computer systems upon request but does not provide any functionality to "redirect" the client to a different home page, as taught and claimed by Applicants. In a previous Examiner Interview (April 9, 2008), Supervisory Examiner Lin essentially agreed that Sullivan teaches something different than what is claimed by Applicants (a "registry server" instead of a "redirection server") and that the two different types of servers provide different functionality, and Supervisory Examiner Lin suggested amending the claims to make it more clear as to how the timestamps and connection identifiers are being used in Applicants' invention in order to further distinguish Applicants' claims from the teachings of Sullivan and in order to avoid any potential § 103 (obviousness) rejections in future Office Actions. Applicants made these distinguishing amendments in the previous Amendment filed April 10, 2008. During the

interview of July 14, 2008, Applicants' attorney expressed bewilderment at the current Office Action's continued reliance on Sullivan as teaching a "redirection server," when in fact it teaches a "registry server" with vastly different functionality. Applicants' attorney also expressed puzzlement in that the current Office Action admits that Sullivan does not teach or suggest Applicants' last limitation in the independent claims ("setting a browser's home page to the retrieved home page identifier...") and seems to imply that the newly added § 103 reference (O'Neil) teaches this limitation, however the Office Action does not explicitly indicate that O'Neil teaches this limitation and, during the interview of July 14, 2008, the Examiner did not expressly indicate which reference the Examiner contends teaches this limitation. Examiner Hoang and Applicants' attorney did not reach any agreement regarding Applicants' claims.

### **Claim Objections**

Applicants note with appreciation that previous objections regarding the claims have been withdrawn by the Examiner in the current Office Action.

### **Claim Rejections - 35 U.S.C. § 101**

Applicants note with appreciation that the rejection of original claims 14-20 (now remaining claims 14 and 18) under 35 U.S.C. § 101 has been withdrawn by the Examiner in the current Office Action.

### **Claim Rejections - Alleged Anticipation Under 35 U.S.C. § 103**

Claims 1, 5, 8, 12, 14, and 18 stand rejected under 35 U.S.C. § 103 as allegedly being obvious, and therefore unpatentable, over U.S. Patent Pub. 2002/0085579 by Sullivan et al. (hereinafter "Sullivan") in view of U.S. Patent No. 6,330,710 to O'Neil et al. (hereinafter "O'Neil"). Applicants respectfully traverse the rejections.

As previously presented, each of the independent claims are directed at a redirection web server that provides a home page identifier to a client computing device. Taking claim 1 as an exemplary independent claim, the limitations found in the independent claims include:

- receiving, over a computer network, at a redirection web site, a home page request from the client computing device, the home page request including a user identifier that identifies a user of the client device, wherein the redirection web site performs the steps including:
  - obtaining a timestamp identifying a current time and a current day;
  - obtaining one or more network connection identifiers that identify one or more computer networks to which the client computing device is connected from the home page request;
  - retrieving, from a nonvolatile storage device, the home page identifier, wherein the retrieving further comprises:
    - ♦ selecting, from the nonvolatile storage device, one or more records that correspond to the user identifier, wherein the nonvolatile storage device includes records for a plurality of user identifiers; and
    - ♦ identifying, from the group of selected records, the home page identifier based upon the obtained timestamp and the obtained network connection identifiers; and
  - setting a browser's home page to the retrieved home page identifier, wherein the setting of the browser's home page includes redirecting the browser executing on the client computing device to the retrieved home page identifier.

Each of Applicants' independent claims is directed at using a "redirection web site" that determines the home page for a client computing device based upon the current timestamp as well as the client's current network connections. During the Examiner Interview of April 9, 2008, Supervisory Examiner Lin agreed that Sullivan does not teach using a "redirection web site" but instead uses a "registry server" that provides different functionality. This different functionality is set forth in Applicants' independent claims and is distinguished from the teachings of Sullivan and O'Neil. Specifically, by using the timestamp and the networks to which the client is currently connected, Applicants' "redirection web site" actually sets the client browser's home

page to the home page identifier that was retrieved by the redirection web site and redirects the browser that is executing on the client computing device to the retrieved home page identifier (see last limitation).

In stark contrast, Sullivan's "registry server" is a server that hosts a register, which Sullivan describes as having a database structure (see Sullivan at [0025]). Sullivan goes on to describe the "registry server" as "a server capable of providing database services..." that is accessible over a computer network (see Sullivan at [0038]). Sullivan describes the devices in his system as having operating systems that "may use the registry 200 to store and access personal preferences for its operation." (Sullivan at [0038]). Therefore, as described by Sullivan, the "registry server" is simply a remote registry (e.g., a database server) that does not perform any "redirecting" as taught and claimed by Applicants. Furthermore, Sullivan describes the devices that can use the "registry server" as "including an operating system that may use the registry..." (Sullivan at [0038]). In other words, the client computing devices that are used in Sullivan's system must have a level of sophistication to retrieve information from the registry server using the device's operating system. In contrast, Applicants' redirection server looks up the home page identifier and redirects the client computing device to the identified home page without requiring the client computing device to include or execute an operating system that is capable of retrieving data from a remote database and processing the data in order to determine the home page that the client computing device should use based upon the device's network connection and the current time of day (timestamp).

The current Office Action contends that "a redirection web site now is just a name without specifying its functionality," (Office Action, p. 3, paragraph 11, emphasis in original). This could be no further from the truth. In accordance with suggestions provided by Examiners Lin and Hoang during the Examiner Interview of April 9, 2008, Applicants amended the independent claims to specifically claim that "**the redirection web site performs the steps including:**" with the majority of the limitations in the independent claim being claimed as being performed by the redirection web site.

Addressing the individual limitations of the independent claim, the Office Action contends that Sullivan teaches “*receiving, over a computer network, at a redirection web site, a home page request from the client computing device, the home page request including a user identifier that identifies a user of the client device, wherein the redirection web site performs the steps including:*” by stating that Sullivan teaches a client browser looking up a home page in a registry server (citing paragraph [0032], lines 3-5 of Sullivan), and further contends that “the home page request including a user identifier that identifies a user of the client device (citing fig. 1, user ID, of Sullivan). First, the Office Action does not even contend that either reference (Sullivan or O’Neil) teach or suggest *receiving, over a computer network, at a redirection web site, a home page request*. Instead, the Office Action merely points to a small section of Sullivan that reads:

When the user turns on his/her PDA and accesses his/her web browser, the browser looks up the default home page in the registry 200 so as to display the preferred web site (e.g., the Gateway home page, “www.gateway.com”), which was previously set by the application or user for situations in which the user was located in his/her work parking lot.

Applicants respectfully point out that neither Sullivan (in the cited section or elsewhere) nor O’Neil, alone or in combination with one another teach “receiving ... at a redirection web site, a home page request...” Sullivan teaches a “registry” that is a database that stores “preference data.” ([0027], lines 1-2). While Sullivan’s registry may be stored on a web server, the selection of a record within the registry is performed by the client device as Sullivan does not teach or suggest redirecting the client to a particular home page by a redirection server. This is important as Sullivan teaches a “personal storage area (PSA)” that is accessed by a client device using Application Programming Interfaces (APIs) (see Sullivan, [0046]). In particular, Sullivan teaches a “SetData” API and a “GetData” API that are used, respectively, to store data in the registry and retrieve such data. While API calls may be performed by more advanced devices, such as personal computers and personal digital assistants (PDAs) that include processors and an operating system, such API calls are not available to less sophisticated devices such as mobile telephones, and, in many cases, are only

available to devices running particular operating systems that are compatible with making such API calls. In contrast, Applicants' "redirection web site" can redirect a client device to a predefined home page (based on parameters) regardless of the sophistication or operating system being used by the client device.

Finally, the Office Action admits that Sullivan does not teach the last limitation found in each of Applicants' independent claims. In the last paragraph page 4, the Office Action states:

Sullivan does not explicitly disclose setting a browser's home page to the retrieved home page identifier, wherein the setting of the browser's home page includes redirecting the browser executing on the client computing device to the retrieved home page identifier.

Instead, the Office Action contends that O'Neil teaches this limitation by stating:

However, O'Neil discloses a redirection response from a server to a client device; the redirection response redirects client's browser to retrieve a web page corresponding to a redirected URL in the response (col. 6 lines 48-52).

While O'Neil does teach "redirection" to a particular type of URL, O'Neil does not teach or suggest anything to do with a client's "home page." In fact, an analysis of O'Neil reveals that O'Neil never mentions the term "home page" and, consequently, never teaches or suggest "setting a browser's home page" to a retrieved home page identifier or redirecting the client's device to the retrieved home page identifier, as taught and claimed by Applicants. Instead, at the cited section, O'Neil states:

The agent servlet 330 may, if desired, also return an HTTP "redirect" response to the Web browser 120. The redirect response may direct the Web browser 120 to retrieve a Web page associated with a URL that identifies the new .jhtml file 510.

The Office Action admits that Sullivan does not teach the "setting..." limitation found in each of Applicants' independent claims and, as can be seen by the cited section above, O'Neil also does not teach or suggest this limitation. While O'Neil uses a redirect response to direct a browser to a Web page that is associated with a URL that identifies a .jhtml file taught by O'Neil, O'Neil simply does not teach or suggest setting the client's home page to the URL nor does O'Neil or Sullivan, alone or in combination

with one another teach or suggest “redirecting the browser ... to the retrieved home page identifier.” as taught and claimed by Applicants.

As discussed above, each of the independent claims (1, 8, and 14), is allowable over Sullivan in view of O’Neil. In addition, each of the remaining dependent claims (5, 12, 18, and 21-23) each depend on one of the independent claims and, therefore, are allowable for at least the same reasons that the independent claims are allowable.

### **Newly Added Claims**

Applicants have added claims 21-23 in this Amendment to clarify the data that is retrieved by the redirection web site and the organization of such data. As discussed above, Sullivan does not teach accessing data using a redirection web site and Sullivan’s registry server is not interchangeable with Applicants’ redirection web site in that the registry server and redirection web site provide different functionality. In addition, the registry server is not accessible by a client device that is unable to perform the API calls taught and described by Sullivan. Support for Applicants’ newly added claims is found in Fig. 3 (element 320) and corresponding text in the specification found on page 12, lines 7-26.

### **Conclusion**

As a result of the foregoing, it is asserted by Applicants that the remaining claims in the Application are in condition for allowance, and Applicants respectfully request an early allowance of such claims.

Applicants respectfully request that the Examiner contact the Applicants’ attorney listed below if the Examiner believes that such a discussion would be helpful in resolving any remaining questions or issues related to this Application.

Respectfully submitted,

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